

Cristina C. Arguedas (Ca. BN 87887)
 Raphael M. Goldman (Ca. BN 229261)
 ARGUEDAS, CASSMAN & HEADLEY, LLP
 803 Hearst Avenue
 Berkeley, CA 94710
 Telephone: (510) 845-3000

Attorneys for Paul Trinidad

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN THE MATTER OF THE
 EXTRADITION OF

PAUL ANTHONY SAYNO TRINIDAD

No. CR 09-70395 MISC (JCS)

**STIPULATION RE MODIFICATION OF
 CONDITIONS OF RELEASE TO
 PERMIT TRAVEL TO FAMILY
 WEDDING AND [PROPOSED] ORDER**

The United States of America, on behalf of the Republic of Latvia, and Paul Anthony Sayno Trinidad, by and through undersigned counsel, hereby stipulate and agree as follows:

This Court admitted Paul Trinidad to bail under specified conditions of release. See Docket # 43, 64. The conditions state, among other restrictions, that Mr. Trinidad may not leave the Northern or Eastern Districts of California. *Id.*

Mr. Trinidad's sister, Elaine Trinidad, will be getting married in Las Vegas, Nevada on May 23, 2010. The parties agree that Mr. Trinidad may travel to Las Vegas

1 to attend the wedding and the attendant family events, leaving on Friday, May 21, 2010,
 2 and returning to this district on Monday, May 24, 2010. During that time Mr. Trinidad
 3 will not be monitored electronically by Pretrial Services, but he will be in the presence of
 4 his appointed guardian, Michelle Adcock, and another of his sureties, his mother
 5 Milagros Sayno.

6 Undersigned counsel for Mr. Trinidad spoke with Pretrial Services Officer
 7 Richard Sarlatte, who reports that Pretrial Services has a general policy of opposing
 8 travel while a person is subject to electronic monitoring because the office is unable to
 9 conduct the monitoring during that period. Mr. Sarlatte acknowledged, however, that
 10 Mr. Trinidad has repeatedly been released from monitoring during the pendency of this
 11 case for purposes of his service in the military, and Pretrial Services has experienced
 12 no problems with Mr. Trinidad's compliance with the terms of his release.

13 So stipulated,

14 Dated: May 17, 2010

JOSEPH P. RUSSONIELLO
 United States Attorney

15 _____
 /s/

16 Nat Cousins
 Assistant United States Attorney

17 Acting for the Republic of Latvia

18
 19 Dated: May 17, 2010

ARGUEDAS, CASSMAN & HEADLEY, LLP

20 _____
 /s/

21 Raphael M. Goldman

22 Attorneys for Paul Trinidad

PURSUANT TO STIPULATION, IT IS SO ORDERED,

Dated: May 18, 2010

Honorable Joseph C. Spero
United States District Court

